No. 15-674

IN THE

Supreme Court of the United States

UNITED STATES OF AMERICA, *et al.*,
Petitioners,

v.

STATE OF TEXAS, *et al.*,
Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

BRIEF OF AMERICAN IMMIGRATION COUNCIL, NATIONAL IMMIGRATION LAW CENTER, SERVICE EMPLOYEES INTERNATIONAL UNION, ADVANCEMENT PROJECT, LATINOJUSTICE PRLDEF, THE LEADERSHIP CONFERENCE ON CIVIL AND HUMAN RIGHTS, AND OTHERS AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS

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INTEREST OF *AMICI CURIAE*

Amici curiae are the American Immigration Council, the National Immigration Law Center, the Service Employees International Union, the Advancement Project, LatinoJustice PRLDEF, The Leadership Conference on Civil and Human Rights, and 320 other immigrants' rights, civil rights, labor, and service provider organizations.[1]

The American Immigration Council ("Immigration Council") is a nonprofit organization established to increase public understanding of immigration law and policy, advocate for the just and fair administration of the immigration laws, protect the legal rights of noncitizens, and educate the public about the enduring contributions of America's immigrants. The Immigration Council engages in impact litigation, appears as *amicus curiae* before federal courts and administrative tribunals, provides technical assistance to immigration lawyers across the country, and has played a key role in implementing Deferred Action for Childhood Arrivals ("DACA").

The National Immigration Law Center ("NILC") is the primary national organization in the United States exclusively dedicated to defending and advancing the rights and opportunities of low-income immigrants and their families. Over the past 35 years, NILC has won landmark legal decisions protecting

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[1] Pursuant to Rule 37.6, amici certify that no counsel for a party authored this brief in whole or in part, and no person other than amici or their counsel made a monetary contribution to the preparation or submission of this brief. Pursuant to Rule 37.3(a), all parties consented to the filing of this amicus brief.

fundamental rights, and advanced policies that reinforce the values of equality, opportunity, and justice. NILC has worked extensively on implementation of DACA, and works closely with organizations led by DACA recipients.

The Service Employees International Union ("SEIU") is an international labor organization representing approximately two million working men and women in the United States and Canada employed in the private and public sectors. Many of SEIU's members are foreign-born U.S. citizens, lawful permanent residents, or immigrants authorized to work in the United States. Many of SEIU's members have mixed-status families.

The Advancement Project ("AP") is a next generation, multi-racial civil rights organization. Rooted in human rights struggles for equality and justice, AP exists to fulfill America's promise of a caring, inclusive, and just democracy. AP combines law, communications, policy, and technology to create workable solutions and achieve systemic change on issues of democracy, voting rights, and access to justice. Its immigrant justice project works with grassroots organizations that serve and advocate on behalf of immigrants, including undocumented immigrants, many of whom would be eligible for expanded DACA and Deferred Action for Parents of Americans and Lawful Permanent Residents ("DAPA").

LatinoJustice PRLDEF is a national nonprofit pan-Latino law organization that has engaged in impact litigation, advocacy, and education to defend the civil and constitutional rights of Latinos since

1972. LatinoJustice champions an equitable society through advancing Latino civil engagement, cultivating leadership, and protecting civil rights and equality in the areas of voting rights, immigrant rights, and fair access to housing, education, and employment. LatinoJustice strongly supports the federal government's lawful executive actions on immigration that provided relief from deportation for thousands of Latina/o students and DREAMers and the more recent expansion of DACA eligibility and DAPA that would provide further protection for Latina/o families across the country.

The Leadership Conference on Civil and Human Rights ("The Leadership Conference") is a diverse coalition of more than 200 national organizations charged with promoting and protecting the civil and human rights of all persons in the United States. It is the nation's oldest, largest, and most diverse civil and human rights coalition. For more than half a century, The Leadership Conference, based in Washington, D.C., has led the fight for civil and human rights by advocating for federal legislation and policy, securing passage of every major civil rights statute since the Civil Rights Act of 1957. The Leadership Conference works to build an America that is inclusive and as good as its ideals. Its member organizations represent people of all races, ethnicities, and sexual orientations.

An appendix to this brief lists the 326 *amici* organizations. These organizations seek to further immigrants' rights, civil rights, labor rights, and other social interests. *Amici* have a substantial interest in this case, which implicates issues that are a central

focus of their advocacy, directly impacts the communities they serve, and concerns initiatives many of them have worked to implement.

SUMMARY OF ARGUMENT

The court below upheld a preliminary injunction that is preventing millions of people with close ties to the United States from applying for an opportunity to receive a temporary, revocable reprieve from deportation and for work authorization. The sweeping injunction directly harms individuals who (1) have been in the United States since they were children or are the parents of U.S. citizens or lawful permanent residents and (2) warrant a favorable exercise of discretion by the Department of Homeland Security ("DHS"), as well as the U.S. citizen and lawful permanent resident children of both groups. By extension, the injunction also harms the communities of the millions of individual immigrants who could benefit from expanded DACA or DAPA.

If the injunction is lifted, many families will be more secure, without the looming threat that loved ones will be deported at a moment's notice. Many deserving individuals will also have access to better jobs and the ability to improve their lives, the lives of their families, and their communities. Indeed, formerly undocumented persons have long made significant contributions to this country. DHS has discretion to grant or deny applications for the initiatives at issue, and the concocted argument to the contrary should not be used to prevent individuals from even applying. The people whose tribulations, struggles, and contributions to the United States are profiled here, and who

represent countless others, illustrate the importance of this case to millions of individuals, their families, their communities, and the nation as a whole.

ARGUMENT

I. The Enjoined Initiatives Would Benefit Millions Of People And Their Families And Communities

The decision below upholds a preliminary injunction blocking an attempt by DHS to both expand the 2012 Deferred Action for Childhood Arrivals initiative and implement a new initiative known as Deferred Action for Parents of Americans and Lawful Permanent Residents.

DACA allows people who have been in the United States since they were children and who meet certain criteria to apply for temporary deferral of deportation (sometimes referred to as "deferred action") and for work authorization. Pet. App. 415a-416a. According to U.S. Citizenship and Immigration Services ("USCIS"), almost 700,000 people were granted deferred action under DACA in approximately three years. USCIS, Number of I-821D, *Consideration of Deferred Action for Childhood Arrivals by Fiscal Year, Quarter, Intake, Biometrics and Case Status: 2012-15 (September 30)*, *available at* http://1.usa.gov/1KNazkM. By expanding DACA, DHS would allow greater numbers of young immigrants who were brought to the United States as children and have made their lives here the opportunity to continue to reside here and thrive. *See* Migration Policy Institute, *Profile of the Unauthorized Population: United States*,

available at http://bit.ly/1FLd5kL (estimating increase of more than 250,000 people eligible for DACA under expansion).

The new initiative, DAPA, would likewise create much-needed stability in immigrant families. DAPA would allow the parents of U.S. citizens and lawful permanent residents to apply for temporary deferral of deportation and for work authorization if they meet certain requirements. Pet. App. 416a-417a. Although exact estimates vary, all sources indicate that millions of people would be eligible for this new initiative. *See, e.g.*, Migration Policy Institute, *Profile of the Unauthorized Population: United States* (estimating approximately 3.6 million people eligible for DAPA); Pet. App. 5a-6a (Court of Appeals' opinion estimating 4.3 million people eligible for DAPA).

DAPA and expanded DACA together promise to benefit millions of individual immigrants who have close ties to this country. These initiatives also stand to benefit millions of U.S. citizen children, other family members, employers, employees, and community members who have established relationships with these individuals.

Under DAPA and expanded DACA, many currently employed undocumented individuals would have access to better jobs and improved working conditions. Because undocumented immigrants, who lack work authorization, seek jobs that minimize their risk of being identified and deported, they often do not work in jobs that best fit their education, skills, and abilities, or those that would maximize their earning po-

tential. Patrick Oakford, *Administrative Action on Immigration Reform, The Fiscal Benefits of Temporary Work Permits*, at 6 (Center for American Progress, 2014), *available at* http://ampr.gs/1vw27HZ. Making workers eligible to apply for deferred action and work permits would allow them greater occupational mobility, enabling them to seek out a wider range of potential career opportunities. Moreover, "[t]he interaction between our broken immigration system and employment and labor laws have made undocumented workers more susceptible to exploitation in the workplace, leading them to earn lower wages than they otherwise could." *Id.* at 5. Eliminating the fear of retaliatory reporting of immigration violations and deportation would allow these workers to better protect their own workplace rights and those of their co-workers, leading to higher real wages and fewer violations of employment and labor laws and regulations.[2]

Those eligible for deferred action will enjoy increased earning potential, producing a positive mul-

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[2] The deferred action initiatives will not have a negative impact on employment for native-born workers. "Theory suggests that these policy changes would not have an effect on the long-run employment (or unemployment) rate . . . as the additional demand associated with the expanded economy would offset the additional supply of workers. . Consistent with the theory, much of the academic literature suggests that changes in immigration policy have no effect on the likelihood of employment for native workers." White House Council of Economic Advisors, *The Economic Effects of Administrative Action on Immigration*, at 9 (Nov. 2014), available at http://1.usa.gov/1vwdrJQ (citing several academic studies conducted between 1990 and 2014).

tiplier effect on local economies. Fiscal Policy Institute, *President's Immigration Action Expected to Benefit Economy, available at* http://bit.ly/1FbnS7q (estimating that wages for those eligible for work authorization will increase by five to 10 percent); Oakford, *Administrative Action on Immigration Reform, The Fiscal Benefits of Temporary Work Permits*, at 3 ("Temporary work permits would increase the earnings of undocumented immigrants by about 8.5 percent as they are able to work legally and find jobs that match their skills."). Overall, one estimate suggests that the group of individuals eligible to receive deferred action through expanded DACA and DAPA "will experience a labor income increase of $7.1 billion dollars." Dr. Raul Hinojosa-Ojeda with Maksim Wynn, *From the Shadows to the Mainstream: Estimating the Economic Impact of Presidential Administrative Action and Comprehensive Immigration Reform*, Appendix A at 32 (North American Integration and Development Center, Nov. 21, 2014), *available at* http://bit.ly/1QShl90. In California alone, data shows that DAPA and expanded DACA have "the potential to boost family earnings in the state by nearly $1.7 billion and to bring nearly 40,000 children out of poverty." USC Dornsife Center for the Study of Immigrant Integration, *Expanding Opportunity: How California Gains if the President's Executive Actions on Immigration are Implemented* (February 2016), *available at* bit.ly/1LHs3de.

The upward mobility that would result from DAPA and expanded DACA is apparent from the results of a national survey of 1,402 young adults who were approved for DACA through June 2013:

> Since receiving DACA, young adult immigrants have become more integrated into the nation's economic institutions. Approximately 61% of DACA recipients surveyed have obtained a new job since receiving DACA. Meanwhile, over half have opened their first bank account, and 38% have obtained their first credit card.

Roberto G. Gonzales and Veronica Terriquez, *How DACA is Impacting the Lives of Those who are now DACAmented: Preliminary Findings from the National UnDACAmented Research Project* (American Immigration Council, 2013), *available at* http://bit.ly/1jaS0tq. In short, DACA created significant economic benefits for qualifying individuals and for the nation at large by permitting greater levels of contribution to the workforce by educated individuals who previously had limited employment opportunities. DAPA and expanded DACA would do the same.

Beyond these economic benefits, there is a less tangible but equally important benefit in the security that family unity provides. *See generally* Human Impact Partners, *Family Unity, Family Health: How Family-Focused Immigration Reform Will Mean Better Health for Children and Families* (June 2013), *available at* http://bit.ly/1eU6dmk (discussing consequences of immigration detention and deportation policy on individuals' physical and mental health and children's educational and behavioral outcomes as documented by numerous academic studies); Ajay Chaudry, *et al.*, *Facing Our Future: Children in the Aftermath of Immigration Enforcement* (The Urban Institute, 2010), *available at* http://urbn.is/217ObaG (studying consequences of parental arrest, detention,

and deportation on children). DAPA and expanded DACA would allow families to stay together, and alleviate the anxiety that families feel about the possibility of being separated.

II. The Human Impact Of The Enjoined Initiatives

The stories of the individuals described below highlight the benefits of permitting DHS to implement DAPA and expand DACA unimpeded by judicial intervention. The following are descriptions of individuals who, with their families and communities, stand to benefit from deferred action and who have long made the United States their home and contributed in a multitude of ways.[3]

A. Individuals Who Immigrated As Children

A significant number of individuals meet the educational and other requirements for initial DACA, but are ineligible under that initiative because they do not satisfy the age and arrival date requirements. Expanded DACA would allow certain individuals who came to the United States as children to apply for temporary protection from deportation and for work authorization regardless of their age on the date of the 2012 DACA announcement, so long as they were already living in the United States on January 1, 2010. The preliminary injunction blocking expanded DACA bars these individuals from seeking this important relief, even as they contribute significantly to our so-

[3] Information for all descriptions is on file with Karen Tumlin at NILC.

ciety. The following are some of the many people who would be eligible for DACA but for the preliminary injunction in this case.

Jose Antonio Vargas. Jose Antonio Vargas, who is now 35, arrived in the United States at age 12 from Antipolo, Philippines. He currently lives in Los Angeles, California. Jose Antonio is a gay Pulitzer Prize winning journalist who was part of the *Washington Post* team covering the Virginia Tech shootings in 2011. He is also a filmmaker and founder of the nonprofit media and culture campaign, "Define American," which seeks to elevate the immigration conversation in the United States. Jose Antonio discovered he was undocumented at age 16 when he attempted to apply for a driver's license. He is the only undocumented person among his more than 30 family members living in the United States, including his U.S. citizen grandmother whom he supports.

Jose Antonio missed the age cut-off for original DACA by a few months, but would qualify for expanded DACA. He is an American entrepreneur and business owner who has made tremendous contributions to society through his films and advocacy work. Jose Antonio has created at least 23 jobs for U.S. citizens despite lacking his own work authorization. He is the owner and editor of a new for-profit news website, #EmergingUS, which has already resulted in eight additional job opportunities.

Alejandro. Alejandro is 21 years old and lives in Los Angeles, California. He was born in Mexico, but came to the United States in 2008 when he was 13 years old. Alejandro is currently in the honors program at Los Angeles Community College, and he

is the first person in his family to attend college. Alejandro is an active member of his academic community and has held numerous positions in student government, including his current position as a Senator-at-Large. Additionally, he volunteers with his school's Puente Program, mentoring other students and coordinating campus events focused on enabling students to transfer to four-year institutions. Alejandro himself will transfer to a four-year college in the fall.

Despite these accomplishments, Alejandro faces numerous impediments to his academic and professional success due to his lack of work authorization. For example, although he has been offered a number of jobs at school as a result of his civic engagement, he has had to decline them. Obtaining work authorization would not only permit him to continue his education, but also to develop his resume to allow him to succeed when he enters the workforce. Alejandro fears that absent the ability to work legally in this country, his academic and career choices will be severely curtailed.

Cris. Cris was born in the Philippines and arrived in the United States at the age of 6, but missed the original cut-off for DACA by one year. Cris is the founder of an award-winning start-up company, GrantAnswers, which helps low-income and first-generation students secure academic and career opportunities. Cris founded this company after helping students earn more than one million dollars in grants and scholarships for college. He is also developing a career readiness mobile application called KeyJargon. He holds a Bachelor's degree in

Psychology and a Master's degree in Criminal Justice from the City University of New York, and has nearly completed his PhD.

Despite his professional successes, Cris remains undocumented. The implementation of expanded DACA would alleviate his and his family's concerns that he may be deported. Through expanded DACA, Cris would be able to continue his doctoral studies, the funding for which was revoked due to his immigration status, and pursue additional career opportunities in public service helping youth and marginalized groups.

Jorge. Jorge came to the United States from Mexico in July 2008 when he was 15 years old, just over a year too late to qualify for the original DACA initiative, but he would qualify for expanded DACA. Jorge and his mother fled Mexico after two family members were killed in drug cartel-related violence. Since arriving in the United States, two more of Jorge's family members in Mexico have been killed. As a result, Jorge is now the oldest living male in his family on his mother's side, and he fears returning to Mexico because of the risk of violence.

Jorge is attending college at the University of Wisconsin at Milwaukee, where he studies civil engineering. He anticipates earning his degree in 2017. He currently works two part-time jobs: as a janitor for office buildings and retirement complexes, and as a restaurant cook. Jorge has been offered jobs that pay higher wages and offer employment-related benefits, but he cannot access them due to his lack of work authorization. Receiving DACA and work au-

thorization would not only enable Jorge to obtain better employment now, but would also make him eligible to pursue his dream job as a civil engineer once he graduates from college.

Aly. Aly has lived in the United States for 30 years. He arrived in 1985 from Dakar, Senegal, at age 8. He currently lives in Syracuse, New York, where he is a community organizer. Aly came to the United States as the son of a diplomat working at the United Nations. He eventually traded his diplomatic visa for a student visa, graduated from Georgetown Preparatory School, attended the University of Pennsylvania, and graduated with a Bachelor of Arts in Political Science from Le Moyne College in Syracuse. He missed the age cut-off for original DACA, but would be able to apply under the expansion.

Juan Carlos. Juan Carlos is 22 years old and lives in Maryland. He was born in El Salvador and came to the United States when he was 15 years old. He was detained while crossing into the United States in 2008, and was placed in removal proceedings. Unable to speak directly with an attorney and confused about the process, he accepted voluntary departure but did not leave the United States. Juan Carlos was not eligible for original DACA, having missed the June 15, 2007 cut-off date for entry into the United States. Following his high school graduation in June 2012, Juan Carlos was offered admission to five colleges. He reluctantly turned down these opportunities because, as an undocumented student, he did not qualify for in-state tuition and could not afford to pay the out-of-state tuition at the colleges that accepted him.

Juan Carlos lives in constant fear of deportation. As a gay man, his deportation to El Salvador could result in severe persecution or even death given El Salvador's history of anti-gay hate crimes and discrimination. In addition to alleviating this fear of deportation, deferred action would allow Juan Carlos to pursue his dreams of attending college and eventually becoming an architect.

Shariece. Shariece was born in the Bahamas and arrived in the United States in 1985 at the age of four. She would qualify for expanded DACA. Shariece graduated from a design architecture high school, with the goal of attending Savannah College of Art and Design. Without a social security number or work authorization, however, she was not able to pay tuition and enroll. She also faces the loss of her current housing and difficulty obtaining basic nutrition. Shariece suffers from abdominal pain that may be caused by a mass in her abdomen. The expanded DACA initiative would allow her to put food in the refrigerator, keep a roof over her head, and obtain the medical treatment she needs. Moreover, expanded DACA would allow Shariece to live a full life instead of just existing day to day.

B. Parents Of U.S. Citizens And Lawful Permanent Residents

DACA was aimed at young people brought to the United States as children who have strong ties to this country. DAPA would provide similar relief for undocumented parents of U.S. citizens and lawful permanent residents—providing important family stability to millions of children. Like DACA recipients,

individuals eligible for DAPA necessarily have long-standing ties to the community. An estimated 69 percent have resided in the United States for ten or more years, with 25 percent living in this country for at least 20 years. Randy Capps, *et al.*, *Deferred Action for Unauthorized Immigrant Parents: Analysis of DAPA's Potential Effects on Families and Children* (Migration Policy Institute and Urban Institute, 2016). Their continued presence in the United States and ability to earn a living are crucial to the development and success of their U.S. citizen and permanent resident children. Given the millions of parents who would be eligible for DAPA, there would also be millions of children who would benefit from the initiative. DAPA recognizes that the task of raising a child is made ever more difficult when uncertainty looms—whether related to deportation or financial insecurity. The following are some people who would be eligible for DAPA if the preliminary injunction is lifted.

Lorena. Lorena is a 30-year-old who lives in San Pablo, California, with her husband and their 10-year-old U.S. citizen son. Growing up in Guanajuato, Mexico, Lorena was locked in isolation for two years, deprived of food, and assaulted both physically and sexually. At age 19, she traveled to the United States with the hope of making an entirely new life for herself. Lorena began volunteering with the Latina Center, where she organized a project to deliver food to day laborers. Building on that experience, she founded and designed a similar program through her church for homeless and low-income families in need of food, clothing, and other basic amenities. In addition, Lorena successfully completed English language courses

and enrolled in community college as an astrophysics and mathematics major. At college, she is creating an astronomy lab and volunteers as a math and astronomy tutor. Her husband works as a carpenter. Lorena would be eligible for DAPA, and receiving it would alleviate her constant fear she will be deported, separated from her son, and returned to Mexico where she would face the same specter of physical, sexual, and emotional violence she previously experienced. DAPA would represent the recognition of Lorena's efforts to improve her own life and the lives of others in her community, as well as an investment in her future contributions to this society.

Juan. Juan arrived in the United States from Mexico more than 15 years ago. Now 42 years old, he lives in Baltimore, Maryland, with his 5-year-old-daughter, a U.S. citizen. Juan's daughter has Down syndrome and suffers from cardiac problems that will require her to undergo several surgeries. She also receives physical therapy at Johns Hopkins University. Although in kindergarten, Juan's daughter is just starting to speak. The multiple medical treatments and care that she receives in the United States are virtually unavailable in Mexico.

Juan attended school only until third grade in Mexico, but believes in the importance of education and has been taking English classes at Goucher College for about eight years. Although he has worked at the same auto body shop for the past 13 years, if he received work authorization through DAPA, he would seek a better job to help support his family. Juan believes that DAPA and work authorization would change his life, allowing him to purchase a home,

plan a Christmas vacation, and live without fear of deportation. He is deeply committed to his community and indebted to the United States for the opportunities it has given him and the person it has allowed him to become. Juan envisions an education for his daughter and other opportunities that only the United States could provide.

Dr. Alina Kipchumba. Dr. Alina Kipchumba, a citizen of Kenya, came to the United States in 1995 to begin a Ph.D. program. In 2002, she obtained a Ph.D. in Biological Sciences from the University of Illinois in Chicago. For six years she had work authorization, and she was employed at the University of South Florida and then at the Sarasota Christian School. Dr. Kipchumba's 11-year-old son, a U.S. citizen, was born with a serious heart condition and has undergone multiple open-heart surgeries. Her son's pediatric cardiologist warned her that it would be impossible for her son to receive the medical treatment he requires in Kenya and that returning to Kenya would be "a death sentence" for him. DAPA would enable Dr. Kipchumba to once again have work authorization, resume working as a teacher, and support her U.S. citizen child.

Mireya. Mireya, 35, and her husband, 38, arrived in the United States 13 years ago and settled in San Bernardino, California, where they live with their three U.S. citizen children, ages 12, 9, and 6. Originally from Michoacán, Mexico, Mireya and her husband traveled to California in 2003, in an attempt to overcome the dismal wages and employment opportunities in Michoacán. For the past 13 years, Mireya's husband has been working as an auto mechanic.

With their children in school and established roots in their community, it is increasingly difficult for the family to imagine leaving all they have built. DAPA would enable Mireya to resume the education in dentistry that she began in Mexico, and would allow her husband to open his own auto repair business. Mireya believes the biggest benefit of DAPA would be that her children would feel a sense of belonging and security that they now lack because she and her husband are undocumented. Mireya remembers the moment when her then four-year-old son asked her why their family was not "normal." In their Catholic parish, Mireya and her husband counsel families just like theirs, who are raising their children with dignity and moral values, despite the obstacles the lack of documentation creates.

Miguel Claros. At age 33, Miguel arrived in the United States in 1998 from Bolivia with a visa that has since expired. More than 15 years later, Miguel lives in Silver Spring, Maryland, with his wife, who is also undocumented, and their two U.S. citizen sons, ages 7 and 2. Miguel is the owner of a small auto repair shop. If granted DAPA, Miguel's anxiety about being deported would subside. His greater sense of security would allow him to invest in the expansion of his business and hire other workers. Miguel's life is informed by his devout Christian beliefs. He volunteers in community organizations including CASA de Maryland, where he helps other immigrants as they adjust to life in the United States.

Maria. Maria is a 46-year-old citizen of Mexico who has lived in the United States for 26 years and currently resides in Durham, North Carolina. She is

the single mother of two U.S. citizen children, a 19-year-old son and a 16-year-old daughter. To support her family, Maria works three jobs: washing dishes and cooking in a restaurant, cleaning houses, and cleaning a school that her son attended on a scholarship through eighth grade. In Maria's words, the implementation of DAPA would be a "dream come true" and would enable her to follow her dream of continuing her studies and opening her own beauty shop. In addition to enabling Maria to realize her potential, DAPA would relieve the fear her children feel that their mother could be removed at any moment.

Baldo. Baldo came to the United States from Michoacán, Mexico, in 1988, when he was 17 years old. He lives in Pasadena, California, with his wife and their two U.S. citizen daughters, ages 10 and 14. While in the United States, he trained as an electrician and, for nearly 20 years, worked for the same company installing electrical wiring and residential security systems. Baldo lost his job in March 2014 when his employer discovered that he was undocumented. Baldo's employer told Baldo that he hated to lose him and that he would like to rehire him as soon as Baldo obtained work authorization. Baldo's current work as an independent contractor has created financial difficulties for him and his family, as he can no longer rely on a weekly paycheck and cannot even count on getting work every week. The lack of a reliable income makes it difficult for Baldo to plan for his family's financial future.

Baldo's financial difficulties are compounded by his fear of being forced to return to Michoacán, where he has not lived in nearly 30 years. He has heard

from family members about kidnappings and other drug cartel-related violence, and would not feel safe returning to Michoacán. Given the risk of harm, he would not want to take his daughters there, but he also would not want to be separated from them.

As the father of two U.S. citizen children, Baldo would benefit from DAPA, which would enable him to return to his former employer and regain the financial stability his family lost when he was terminated from his long-time job. Deferred action would also relieve Baldo of his fear of deportation and allow his family to remain together.

Denis and Reina. Denis has lived in the United States for 12 years. His wife, Reina, has lived in the United States since 2007. Both are from Honduras and have a 2-year-old son who is a U.S. citizen. Denis left Honduras in 2003 because he feared for his life. He has lived in the New Orleans area since Hurricane Katrina. A skilled roofer and construction worker, Denis came to the city to help rebuild New Orleans.

Unfortunately, Denis and Reina's son has been diagnosed with respiratory complications that require regular physician visits as well as emergency care. Denis' income is the family's main source of financial support, and multiple physicians have advised him that his continued presence in the United States is critical to ensuring that his son receives adequate medical care. Denis is subject to a final removal order, which was issued following proceedings that he did not adequately understand and at which he appeared *pro se*. Denis lives in constant fear of deportation. DAPA would protect Denis and Reina from

deportation, allowing their family to remain together and maximizing the chances for a healthy future for their son.

Mercedes. Mercedes lives in Boulder, Colorado, and is a single mother caring for three U.S. citizen daughters. Mercedes has not seen her husband since late 2011, when he was deported as a result of a warrant for failure to appear in court for a traffic citation. Her husband had previously been the sole provider for the family, and Mercedes, now age 49, has taken on all the various roles that the two of them used to share in raising their daughters, ages 17, 15, and 10. To make ends meet, Mercedes works two jobs, as a private childcare provider and a caregiver for the elderly.

Her husband's deportation created emotional and practical challenges for Mercedes and her family. As a result of his absence, her middle child has been suffering from depression, refusing to leave home other than to go to school. Mercedes' own health has also deteriorated. She suffers from anemia, osteoporosis, and a heart murmur, in addition to being pre-diabetic. Because she cannot afford health insurance, she avoids getting echocardiograms due to the high cost. The possibility of being deported is Mercedes' chief concern when she thinks about the future of her daughters. Not only would her two younger daughters no longer have a mother to raise them, but her oldest daughter, who is nearly 18, would have to defer her own dreams of going to college and becoming a forensic anthropologist to take care of her sisters. The implementation of DAPA would mean Mercedes would no longer risk separation from her children

and would have enhanced opportunities to provide for her family and contribute to her community.

Nga. Nga came to the United States from Vietnam on a V-nonimmigrant visa in 2004 to reunite with her husband, a lawful permanent resident. She started working in Houston, Texas, and became an integral part of her community. But her marriage ended in divorce before her immigrant visa process was finalized. She moved in with her uncle until 2007, when he sexually abused her. She moved out, sought legal assistance, and reported his conduct to the police, but her uncle was never prosecuted. Nga was placed in a women's shelter as she had nowhere else to go. Later, she moved in with her partner, who was a lawful permanent resident. In 2009, when her partner found out that Nga was pregnant with his child, he broke up with her. Nga was, once again, left to fend for herself. In June 2010, Nga gave birth to a baby girl, a U.S. citizen, and began raising her as a single mother.

Around the same time, Nga's work permit expired. She was left without a way to earn a steady income, and became embroiled in a custody battle with her ex-partner over their child. Based in part on Nga's lack of stable employment, the father of the child was awarded custody. Nga currently sees her daughter weekly, while working low-paying jobs in the restaurant industry. DAPA would help Nga seek better and more stable employment opportunities, and regain more equitable custody of her daughter.

Mayela. Mayela is a 53-year-old mother of two U.S. citizens, ages 15 and 16. She immigrated to the Unit-

ed States from Mexico more than 20 years ago, and lives in San Jose, California. She and her husband are both undocumented. Mayela cleans homes, babysits children, and cares for senior citizens. Her husband works four low-paying jobs. Mayela's diabetes requires her to pay for monthly clinic visits, laboratory fees, and medications because she is ineligible for medical coverage.

DAPA would offer Mayela a sense of security as she would no longer live in fear of deportation. DAPA would also enable her to apply for a work permit and to seek higher-paying jobs to help her sons, who plan to attend college. Mayela wants one day to feel accepted and included in the country that she considers her home.

Antonio and Ramona. Antonio and Ramona came to the United States from Mexico in 1995. They currently reside in Sacramento, California. Antonio, age 53, and Ramona, age 52, have three children. Their two younger daughters are U.S. citizens, and their oldest daughter is a DACA recipient. Antonio and Ramona began cleaning buildings when they arrived in the United States, and are now the proud owners of a cleaning business that they have operated for more than 15 years. Through their business, they have employed various individuals.

Antonio and Ramona would like to finally feel secure. They were unable to drop off one of their U.S citizen daughters at college in San Diego and cannot visit her there due to immigration checkpoints on the road from Sacramento to San Diego. Diana, their oldest daughter, is able to make trips from Sacra-

mento to San Diego to see her sister because DACA enables her to travel without the fear of being stopped and deported. Diana hopes that her parents can soon apply for DAPA so that the family can participate in common experiences without fearing separation.

III. Contributions Of Formerly Undocumented People

The stories in the preceding section provide a small glimpse into the human toll the preliminary injunction has caused by blocking the important immigration initiatives at issue. The stories also illustrate the benefits DAPA and expanded DACA would provide to the nation's families and communities. Many undocumented immigrants develop deep ties to the United States over time, and the people who are the subjects of the stories above have already contributed in myriad ways to their communities. But the loss of human potential without DAPA and expanded DACA is severe. There is no way of knowing what the many people who would benefit from these initiatives would contribute to their communities and society as a whole if they were not held back by their marginalized status. As the stories below demonstrate, when undocumented immigrants are given the opportunity to come out of the shadows, their talents and capacities blossom, enriching their communities and the United States as a whole.

Julissa Arce. Julissa, a 32-year-old U.S. citizen, lives in Los Angeles, California. Profiled in Bloomberg News, "How an Undocumented Immigrant from Mexico Became a Star at Goldman Sachs," as well as on NBC News and other media outlets, Julissa was

born in Mexico and came to the United States when she was 11 years old. She thereafter attended secondary school and college in the United States, and in the summer before her senior year of college, she worked as an intern at Goldman Sachs. In 2005, while still undocumented, Julissa began working full-time as an analyst at Goldman Sachs. Over the course of the next six years, she moved up in the organization, eventually becoming a Vice President. None of her colleagues knew her immigration status. After she married in 2008, she was able to adjust her status to become a legal permanent resident, and on August 8, 2014, she became a U.S. citizen.

Despite her more than $300,000 salary, Julissa left her job at Goldman Sachs, seeking to make a contribution to her community. She currently is the chair and co-founder of the Ascend Educational Fund, a college scholarship and mentorship program for immigrant students in New York City. For Julissa, one of the proudest days of her life was the day she became a U.S. citizen. After a decade of living in the shadows, she feels grateful to be able to contribute fully to the country she considers home. She is relieved that she will never again have to live in fear of being deported from the country she loves, and that on November 8, 2016, she will be able to cast a ballot for President for the first time in her life.

Suamhirs Montecristo Piraino-Guzman. Suamhirs, a U.S. citizen, is 25 and lives in San Diego, California. Born in Honduras, Suamhirs was kidnapped and brought to the United States as a victim of sex trafficking when he was around 14 years old. Approximately six months later, he was rescued and

placed in foster care. After three years of living without legal status, in September 2008 he became a legal permanent resident through the Special Immigrant Juvenile program, which is available to foreign-born children in the United States who have been abused, abandoned, or neglected. Suamhirs graduated from the University of California at San Diego in 2013. He became a certified behavioral health specialist and counselor in 2015. Using his own personal experience to address the mental health needs of victims of severe crimes, he created a training program to help other counselors. As a result of this innovative training, the White House invited Suamhirs to become a member of the U.S. Advisory Council on Human Trafficking, through which survivors of trafficking provide input and expertise to federal agencies on U.S. anti-trafficking policy. Suamhirs is thankful for the opportunity to live legally in the United States, obtain an education, and serve his country by helping former victims of trafficking like himself.

Mariana Zamboni. Mariana, a 31-year-old U.S. citizen, lives in Los Angeles, California. She was born in Guatemala and came to the United States when she was 7 years old. From the time she arrived through her undergraduate years at the University of California, Los Angeles, Mariana was undocumented. In 2007, she was able to become a legal permanent resident through the Nicaraguan Adjustment and Central American Relief Act. That year, Mariana was accepted into Harvard's Graduate School of Education, where she received her Master's of Education degree in 2008. Mariana's lawful status was essential to her Harvard education because it allowed

her to qualify for the necessary financial aid. Throughout Mariana's career she has served her community, both as a member of AmeriCorps and as an educator promoting the importance of literacy to low-income families. She has also taught second grade, worked with children with special needs, and advocated for educational access for immigrant youth. Additionally, she has been an active member of a faith community for 15 years. She currently works as a Program Coordinator for Fuller Theological Seminary. Mariana, a U.S. citizen, no longer lives with the fear of being deported from the country that is her home or of being separated from her family or her church.

Alexander Brian Arredondo (known as "Carlos" Arredondo). Carlos is a 55-year-old U.S. citizen, living in Boston, Massachusetts. Born in Costa Rica, he came to the United States in 1980. For five years Carlos lived in the United States without documentation and supported himself by fixing typewriters. He became a legal permanent resident after his marriage. The father of two U.S. citizens, his life changed in 2004 when his elder son, Alexander, was killed in combat in Iraq. Shortly thereafter, his younger son, Brian, committed suicide. Following these tragedies, Carlos became an advocate for military families. He has worked with the Gold Star Families for Peace and established the Arredondo Family Foundation, an organization that provides emergency funds for families of veterans who commit suicide. In 2013, Carlos became a hero in the aftermath of the Boston Marathon bombing when he ran into the carnage to rescue the injured. One of the men he helped carry to the emergency medical tent was a man whose legs

had been blown off. He also helped direct Spanish-speaking marathon runners to safety. Carlos continues to work to ensure that issues affecting the Latino community, including veterans' issues, are acknowledged and addressed by lawmakers.

Dr. Alfredo Quiñones-Hinojosa. Born and raised in Mexico, Dr. Quiñones-Hinojosa (better known as "Dr. Q") is an internationally renowned neurosurgeon and neuroscientist who leads cutting-edge research to cure brain cancer. He currently directs the Brain Tumor Surgery Program at Johns Hopkins Bayview Medical Center, the Pituitary Surgery Program at Johns Hopkins Hospital, and the Brain Tumor Stem Cell Laboratory at Johns Hopkins School of Medicine. From the age of 14, Dr. Q came to the United States every summer to work in the fields to help support his family. When he was 19, he settled in Fresno, California, where he spent two years working as a cotton picker, painter, or welder by day, and attending school in the evening. In 1988, he began working with a railroad crew and, one year later, was promoted to foreman.

As a result of legislation that allowed certain farmworkers to regularize their status, Dr. Q became a legal permanent resident in 1991. The following year, he received a scholarship to the University of California at Berkeley, where he studied psychology. Following his graduation, Dr. Q was accepted to Harvard Medical School. During his studies, he pursued research fellowships, obtained numerous academic honors, and became a U.S. citizen in 1997. He ultimately graduated cum laude in 1999 and gave the commencement speech.

Over the next six years, Dr. Q did an internship, residency, and post-doctoral work at the University of California, San Francisco, and found his calling as a neurosurgeon. In 2005, Dr. Q came to Johns Hopkins as a professor and surgeon specializing in brain cancer and pituitary tumors; he received tenure in 2011. Dr. Q specializes in brain cancer surgery and uses his hands, feet, and mouth to control instruments and a microscope. He traces his ability to manipulate multiple objects to the time he spent working in the fields. Dr. Q feels honored to be able to contribute to the United States and privileged to be able to watch his children grow up as U.S. citizens.

IV. DHS Line Officers Have Discretion To Evaluate Requests For Deferred Action On A Case-By-Case Basis

Notwithstanding how meritorious any individual's claim for deferred action may be and what that person can contribute to society, opponents of deferred action profess to be concerned that DHS will not exercise its discretion to withhold deferred action from undeserving individuals, a position that the court below adopted. Pet. App. 55a-64a. As Petitioners have explained, however, DHS maintains complete discretion to decide on a case-by-case basis whether to grant any particular individual's request for deferred action. Pet. Br. 4-5, 71-73.

In the experience of *amici*, many of whom have advised DACA applicants and their lawyers, some DACA denials are based solely on this unreviewable prosecutorial discretion. That is, individuals meeting all the DACA eligibility requirements are none-

theless denied deferred action, and have no further recourse. Indeed, a form used for denial of DACA requests includes a box specifically allowing denials solely on the basis of discretion—even where eligibility guidelines are met—as well as another box permitting denial where the requestor "do[es] not warrant a favorable exercise of prosecutorial discretion because of national security or public safety concerns." Applicants cannot appeal the denials, nor are they entitled to reconsideration of these discretionary determinations.

The following case examples illustrate the types of circumstances that have led DHS officials to exercise their discretion to deny or terminate DACA in cases of individuals who met all of the threshold eligibility criteria.

Christian. Christian, a 24-year-old Guatemalan national, received a discretionary DACA denial in August 2013. Christian came to the United States when he was 8 years old. His family settled in the Kansas City area. In 2009, following a consolidated hearing with his father in which his father was denied asylum, Christian and his father were ordered removed. During the removal proceeding, the government accused Christian's father of engaging in war crimes during the Guatemalan civil war. That war concluded in 1996, when Christian was 5 years old.

Despite the immigration judge's decision, Christian did not leave the United States because his U.S. citizen daughter suffers from a chromosomal abnormality called Turner's Syndrome. Christian was the primary provider for the child and the child's mother.

After DACA was announced, Christian applied. He met all the established eligibility guidelines. Christian stated in his application for work authorization that he sought a work permit to provide for his immediate and extended family, and to make donations to his church. He expressed a desire to attend college and enlist in the U.S. military. USCIS denied Christian's DACA request. The denial provided that Christian had not established that he warranted a favorable exercise of prosecutorial discretion. No further explanation was given.

Adolfo. Adolfo also was denied DACA despite meeting all the eligibility guidelines. Adolfo, now age 29, came to the United States from El Salvador when he was 14. He fled violence at the hands of his uncle. He initially resided in Los Angeles and then moved to the Washington, D.C., area.

After arriving in the United States, Adolfo joined a gang. Two years later, at age 16, he decided to turn his life around and escaped the gang. For the next several years, Adolfo helped law enforcement combat gang activity. He began working with a local non-profit that seeks to keep Latino youth out of gangs and in school. He regularly travelled to schools to explain why young people should stay out of gangs. Adolfo went on to obtain his GED degree, and works full-time to support himself and his young U.S. citizen child.

Adolfo disclosed his former gang membership in his DACA application. In connection with his DACA request, an immigration officer questioned Adolfo for approximately three hours regarding his former gang membership. Several months later, Adolfo re-

ceived a denial of his DACA request solely on the ground that he did not warrant a favorable exercise of prosecutorial discretion.

Francisco.[4] In January 2014, DHS denied the DACA request of Francisco, a young Virginia man. Francisco came to the United States from Mexico when he was 10 years old. Francisco is married to a U.S. citizen and is the father of a 6-year-old U.S. citizen child. At the time he requested DACA, Francisco was enrolled in a local community college and was working full-time to support his family. Francisco's mother and siblings lawfully reside in the United States. Although Francisco had minor criminal convictions, his criminal history did not disqualify him from DACA. DHS nonetheless denied Francisco's DACA request on the ground that he did not warrant a favorable exercise of prosecutorial discretion.

Luis. Luis has lived in the United States since he came from Mexico when he was 3 years old. He grew up in California and, after completing three years of high school, moved to Colorado. There, Luis got married and had a daughter. Finding work in painting and construction, Luis dedicated himself to supporting his family. He enrolled in a GED program to complete his high school education.

Luis had contact with the justice system on four occasions, but did not run afoul of the DACA disqualifying grounds because of the nature of the offenses. Luis applied for DACA and submitted proof that he

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[4] This individual's name has been changed at his counsel's request.

met the eligibility guidelines. Nevertheless, DHS denied his application as a matter of discretion. The only box checked on the template denial he received provided: "You have not established that you warrant a favorable exercise of discretion."

Jose. Jose came to the United States from Mexico when he was 4 years old. His family settled in Texas, where Jose excelled in school. After graduating from high school, he enrolled in community college courses while working various jobs to help provide for his family. Jose helped support his niece and nephew. He dreamed of one day being able to complete his education.

In October 2014, he received a discretionary DACA denial. Jose met all the DACA guidelines, had no criminal convictions, is married to a U.S. citizen, is the father of a U.S. citizen, and helps his lawful permanent resident mother take care of his three siblings, two of whom are U.S. citizens and one of whom has DACA.

The only blemish on Jose's record is a criminal charge that did not result in conviction. In 2011, Jose was arrested and accused of sexual assault of a child under 17 years of age based on his relationship with a woman who was then his girlfriend and is now his wife and the mother of his U.S. citizen child. A grand jury investigated the case and declined to indict Jose. Upon his release from state custody, Jose was placed in removal proceedings. An immigration judge subsequently ordered Jose's release on bond, which enabled him to request DACA.

Jose demonstrated that he met all the DACA guidelines. That removal proceedings were pending when he submitted his DACA request did not render him ineligible. Likewise, that Jose had been charged with a felony did not disqualify him because he was not convicted. Nevertheless, his application was denied solely because, according to DHS, Jose did not warrant a favorable exercise of discretion.

Gabriela. Gabriela, a 31-year-old Mexican national who has resided continuously in the United States since 2006, received DACA in June 2014. A year and a half later, however, DHS exercised its discretion to revoke her DACA status although there had been no change in her eligibility. Today, Gabriela is a single mother raising three U.S. citizen children. Her son Abraham suffers from numerous physical disabilities, including a ventricular defect, pulmonic stenosis, transposition of the great arteries, and a heart murmur. Gabriela has managed to finish high school, purchase her own mobile home, and become a staunch advocate for immigrants' rights with a local organization called Border Network for Human Rights. Without DACA, she cannot work legally in the United States and will have great difficulty providing for her children.

As the above stories indicate, the argument that the government lacks discretion to deny deferred action, or to revoke it at any time once granted, is simply wrong. DHS has complete discretion to deny deferred action for any reason, and the argument to the contrary should not be a basis for preventing individuals from applying for DAPA and expanded DACA,

which could be of great benefit to them, their families, their communities, and the country as a whole.

CONCLUSION

For the reasons provided by Petitioners and the reasons given above, this Court should reverse the decision below and vacate the preliminary injunction that is standing in the way of implementing DAPA and expanded DACA, which would benefit this country in countless ways.

Respectfully submitted,

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APPENDIX: LIST OF *AMICI CURIAE*

1. Action NC
2. Advancement Project
3. The Advocates for Human Rights
4. African Services Committee
5. AIM for Equity
6. Alabama Coalition for Immigrant Justice (ACIJ)
7. Alianza Americas
8. Alliance for Citizenship
9. Alliance San Diego
10. American Civil Liberties Union
11. American Friends Service Committee (AFSC)
12. American Immigration Council
13. American Immigration Lawyers Association
14. American Jewish Committee
15. American-Arab Anti-Discrimination Committee (ADC)
16. Americans for Immigrant Justice
17. America's Voice Education Fund
18. Anti-Defamation League
19. API Equality - Los Angeles
20. Arab American Action Network (AAAN)
21. Arab Resource and Organizing Center
22. Arizona DREAM Act Coalition
23. Arkansas United Community Coalition
24. Asian & Pacific Islander American Health Forum
25. Asian & Pacific Islander American Vote - Michigan
26. Asian American Legal Defense and Education Fund (AALDEF)
27. Asian Americans Advancing Justice - AAJC

28. Asian Americans Advancing Justice - Asian Law Caucus
29. Asian Americans Advancing Justice - Atlanta
30. Asian Americans Advancing Justice - Los Angeles
31. Asian Law Alliance
32. Asian Pacific American Network of Oregon (APANO)
33. Asian Pacific Institute on Gender-Based Violence
34. Asian Pacific Islander Legal Outreach
35. Asian Pacific Policy & Planning Council
36. Asian Services In Action, Inc.
37. Asociación de Liderazgo Comunitario
38. Association of Asian Pacific Community Health Organizations
39. Association of Farmworker Opportunity Programs
40. Ayuda
41. Bet Tzedek Legal Services
42. Black Alliance for Just Immigration
43. Black Immigration Network
44. Boat People SOS - Houston (BPSOS)
45. Border Network for Human Rights
46. Brazilian Worker Center, Inc.
47. Brighton Park Neighborhood Council
48. California Immigrant Policy Center
49. California Immigrant Youth Justice Alliance
50. California Primary Care Association
51. California Rural Legal Assistance Foundation
52. Canal Alliance
53. Caring Across Generations
54. CASA
55. Casa Cornelia Law Center

56. Catholic Legal Immigration Network, Inc.
57. Causa Oregon
58. Center for Community Change (CCC)
59. Center for Employment Training
60. Center for Popular Democracy
61. Central American Resource Center - Los Angeles
62. Central American Resource Center (CARECEN DC)
63. Central Valley Immigrant Integration Collaborative
64. Centro de Información
65. Centro de los Derechos del Migrante, Inc.
66. Centro Laboral de Graton
67. Centro Legal de la Raza
68. Chinese American Service League
69. Chinese for Affirmative Action
70. Cincinnati Interfaith Workers' Center
71. Civil Rights Education and Enforcement Center (CREEC)
72. Clergy and Laity United for Economic Justice (CLUE)
73. Cleveland Jobs with Justice
74. Clínica Monseñor Oscar A. Romero
75. Clínica Sierra Vista
76. Coalition for Humane Immigrant Rights of Los Angeles (CHIRLA)
77. Colectiva Legal del Pueblo
78. Colorado Immigrant Rights Coalition
79. Colorado People's Alliance
80. Columbia Legal Services
81. Communities for a Better Environment
82. Community Health Partnership
83. Community Legal Services in East Palo Alto

84. Comunidades Unidas
85. Council of Mexican Federations
86. Council on American-Islamic Relations
87. Cross Border Network
88. Define American
89. Delaware Alliance for Community Advancement
90. Dolores Street Community Services
91. East Bay Community Law Center
92. East Bay Sanctuary Covenant
93. Eastmont Community Center
94. Education and Leadership Foundation
95. El CENTRO de Igualdad y Derechos
96. El Centro de la Raza
97. El Centro Hispano
98. El Comité de Apoyo a los Trabajadores Agrícolas
99. Ella Baker Center for Human Rights
100. Emerald Isle Immigration Center
101. Equal Justice Center
102. Equality California
103. Esperanza Immigrant Rights Project, CCLA
104. Fair Immigration Reform Movement (FIRM)
105. Families First Services Center, Inc.
106. Families USA
107. Family Forward Oregon
108. The Farmworker Association of Florida, Inc.
109. Farmworker Justice
110. Florida Immigrant Coalition (FLIC)
111. Food Empowerment Project
112. Fresno Economic Opportunities Commission
113. FWD.us
114. Gamaliel Network
115. Gender Health Center

116. Genesis Center
117. Georgia Association of Latino Elected Officials (GALEO)
118. Georgia Latino Alliance for Human Rights
119. GLBTQ Legal Advocates & Defenders (GLAD)
120. Escondido Community Immigration Services
121. The Guatemalan-Maya Center
122. Gulf Coast Center for Law & Policy
123. Hawai'i Coalition for Immigrant Rights
124. Highlander Research and Education Center
125. Hip Hop Caucus
126. Hispanic American Community Education and Services (HACES)
127. Hispanic Cultural Center of Idaho
128. Hispanic Federation
129. Hispanic National Bar Association
130. HOLA Ohio
131. Human Agenda
132. Idaho Community Action Network (ICAN)
133. Illinois Coalition for Immigrant and Refugee Rights
134. Immigrant Defenders Law Center
135. Immigrant Defense Project
136. Immigrant Justice Initiative
137. Immigrant Law Center of Minnesota
138. Immigrant Legal Advocacy Project
139. Immigrant Legal Resource Center
140. Immigrant Worker Project Ohio
141. Immigration Center for Women and Children
142. Immigration Equality
143. Indo-American Center
144. Interfaith Leadership Project
145. Interfaith Movement for Immigrant Justice
146. Interfaith Worker Justice of East Tennessee

147. International Brotherhood of Teamsters
148. International Service Center
149. Iowa Citizens for Community Improvement
150. Islamic Center of San Diego
151. Japanese American Citizens League
152. Jewish Family and Children's Services of the East Bay (JFCS East Bay)
153. Jewish Voice for Peace - Chicago
154. Jobs With Justice
155. Junta for Progressive Action, Inc.
156. Just Communities
157. Just Neighbors Ministry
158. The Korean American Association of Chicago
159. Korean American Community Services
160. Korean Immigrant Workers Advocates of Southern California (KIWA)
161. Korean Resource Center
162. La Raza Centro Legal
163. Lambda Legal Defense and Education Fund, Inc.
164. Latin America Working Group Education Fund
165. Latin American Coalition
166. Latin American Legal Defense and Education Fund (LALDEF)
167. Latino Commission on AIDS
168. Latino Policy Forum
169. LatinoJustice PRLDEF
170. Lawyers' Committee for Civil Rights of the San Francisco Bay Area
171. The Leadership Conference on Civil and Human Rights
172. League of United Latin American Citizens
173. League of United Latin American Citizens Cicero/Berwyn (LULAC Cicero/Berwyn)

174. Legal Aid Foundation of Los Angeles
175. Legal Aid Justice Center
176. The Legal Aid Society
177. Legal Aid Society - Employment Law Center
178. Legal Aid Society of San Mateo County
179. Legal Aid Society of Santa Clara County
180. Legal Services for Children
181. Legal Services of Southern Piedmont
182. LifeLong Medical Care
183. Long Beach Immigrant Rights Coalition
184. Long Island Jobs with Justice
185. Los Angeles Center for Law and Justice
186. Los Angeles County Federation of Labor, AFL-CIO
187. Los Angeles LGBT Center
188. Lowcountry Immigration Coalition
189. MAFO, Inc.
190. Maine Immigrants' Rights Coalition (MIRC)
191. Maine People's Alliance
192. Maintenance Cooperation Trust Fund
193. Make the Road New York
194. Massachusetts Immigrant and Refugee Advocacy Coalition
195. Mexican American Bar Association of Los Angeles County
196. Mi Casa
197. Mi Familia Vota
198. Michigan Coalition for Immigrant and Refugee Rights
199. Michigan Immigrant Rights Center
200. Michigan Migrant Legal Assistance Project, Inc.
201. Michigan United

202. The Migrant and Immigrant Community Action Project (The MICA Project)
203. Migrant Justice
204. Miguel Contreras Foundation
205. Mississippi Immigrants Rights Alliance
206. Missouri Immigrant and Refugee Advocates
207. Mobilize the Immigrant Vote
208. Montana Immigrant Justice Alliance (MIJA)
209. Montana Organizing Project (MOP)
210. Movement of Immigrants in Action (Mía)
211. Mujeres Unidas y Activas
212. Multi-Cultural Center of Sioux Falls
213. NAFSA: Association of International Educators
214. National Asian Pacific American Bar Association
215. National Center for Lesbian Rights
216. National Coalition on Black Civic Participation
217. National Conference of Vietnamese American Attorneys
218. National Council of Asian Pacific Americans (NCAPA)
219. National Council of Jewish Women
220. National Council of La Raza
221. National Day Laborer Organizing Network
222. National Domestic Workers Alliance
223. National Employment Law Project
224. National Federation of Filipino American Associations
225. National Guestworker Alliance
226. National Immigrant Justice Center
227. National Immigration Law Center
228. National Immigration Project of the National Lawyers Guild

229. National Korean American Service and Education Consortium
230. National Latina Institute for Reproductive Health
231. National Network for Arab American Communities
232. National Partnership for New Americans
233. National People's Action
234. Nebraska Appleseed Center for Law in the Public Interest
235. Neighborhood Centers, Inc.
236. New Hampshire Alliance for Immigrants and Refugees
237. New Jersey Alliance for Immigrant Justice
238. New Jersey Policy Perspective
239. New Mexico Immigrant Law Center
240. New Orleans Workers' Center for Racial Justice
241. The New York Immigration Coalition
242. NewBridges Immigrant Resource Center
243. 9to5, National Association of Working Women
244. North Bay Jobs with Justice
245. The North Carolina Justice Center
246. Northwest Forest Worker Center
247. Northwest Health Foundation
248. Northwest Immigrant Rights Project
249. Northwestern University Asian Pacific American Coalition
250. OneAmerica
251. OneJustice
252. Orange County Communities Organized for Responsible Development (OCCORD)
253. The Oregon Bus Project
254. Oregon Latino Agenda for Action

255. Organization of Chinese Americans - Asian Pacific American Advocates (OCA - Asian Pacific American Advocates)
256. Pacific American Foundation
257. Pangea Legal Services
258. Pennsylvania Immigration and Citizenship Coalition
259. PICO National Network
260. Pilipino Workers Center of Southern California
261. Pineros y Campesinos Unidos del Noroeste (PCUN)
262. Pisgah Legal Services
263. Planned Parenthood Federation of America
264. Progreso Latino
265. Progressive Leadership Alliance of Nevada
266. Promise Arizona
267. Public Justice Center
268. Public Law Center
269. Red Mexicana de Líderes y Organizaciones Migrantes
270. Refugee and Immigrant Center for Education and Legal Services
271. Sacred Heart Community Service
272. Safe Passage Project
273. San Diego Immigrant Rights Consortium
274. San Francisco Lesbian Gay Bisexual Transgender Community Center (SF LGBT Center)
275. San Ysidro Health Center
276. Sanctuary for Families
277. Sauti Yetu Center for African Women and Families
278. Service Employees International Union

279. Services, Immigrant Rights, and Education Network (SIREN)
280. Sin Barreras/Without Barriers
281. Skinner Leadership Institute, Inc.
282. Social Justice Collaborative
283. Somos un Pueblo Unido (SOMOS)
284. South Asian American Policy & Research Institute
285. South Asian Americans Leading Together
286. South Asian Bar Association of North America
287. South Asian Helpline & Referral Agency (SAHARA)
288. South Asian Network
289. South Carolina Appleseed Legal Justice Center
290. Southeast Asia Resource Action Center (SEARAC)
291. Southeast Immigrant Rights Network
292. Southern Border Communities Coalition
293. Southern Poverty Law Center
294. Spanish Community Center
295. St. John's Well Child and Family Center
296. Student Action with Farmworkers
297. Sunflower Community Action
298. Tacoma Community House
299. Tennessee Immigrant and Refugee Rights Coalition
300. Tennessee Justice Center
301. Texas Organizing Project
302. Thai Community Development Center
303. Tulsa Immigrant Resource Network
304. 21 Progress
305. UCLA Labor Center
306. UNITE HERE

307. United Farm Workers Foundation (UFW Foundation)
308. United Farm Workers of America
309. United Migrant Opportunity Services/UMOS, Inc.
310. United Taxi Workers
311. Valle del Sol
312. Virginia Coalition for Immigrant Rights
313. Virginia Coalition of Latino Organizations (VACOLAO)
314. Voces de la Frontera
315. Voice of Vietnamese Americans
316. Voto Latino
317 The Wage Justice Center
318. Washington Community Action Network
319. Washington Defender Association
320. Washington Dream Coalition
321. Wayne Action for Racial Equality
322. Western States Center
323. Worker Justice Center of New York, Inc.
324. Workers Defense Project
325. The Workers' Rights Center
326. World Relief